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James M. Herndon

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

James M. Herndon,

Plaintiff,

vs.

City of Henderson, a political subdivision of The State of Nevada; **Sgt. M. Gillis,** individually and in his official capacity as a police officer; **Officer L. Good,** individually and in his official capacity as a police officer; **Officer A. Nelson,** individually and in his official capacity as a police officer; **Officer D. Nerbonne,** individually and in his official capacity as a police officer; **Officer D. Russo,** individually and in his official capacity as a police officer; **Officer E. Vega,** individually and in his official capacity as a police officer; Doe Officers I through X, inclusive and Roe Entities I through X, inclusive

Defendants.

CASE NO.: 2:19-cv-00018-GMN-NJK

Second Stipulation and Proposed Order to Extend Briefing Deadlines (ECF # 55)



Plaintiff, James Herndon, through his counsel of record, Marjorie L. Hauf, Esq. and Matthew G. Pfau, Esq., of H & P LAW, and Defendants, City of Henderson, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega through their counsel of record, Nicholas G. Vaskov, Esq. and Nancy D. Savage, Esq. of CITY ATTORNEY'S OFFICE, do hereby stipulate and agree to Extend the due dates of Plaintiff's Opposition to Defendants, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega's Motion for Summary Judgment and Defendant's Reply in Support to Defendants, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega's Motion for Summary Judgment.

Currently, Plaintiff's Opposition is due December 2, 2020. Plaintiff and Defendant agree to Extend the Deadline for Plaintiff to file his Opposition to December 9, 2020. and for Defendant to file their Reply in Support to January 18, 2021. The extensions are being requested in good faith and not for the purpose of delay. The extensions are being requested as the issues to be briefed are extensive and complicated. Plaintiff's co-counsel, Micah Echols, Esq. of CLAGGETT & SYKES, had a recent COVID-19 outbreak in his office, and as such, they have been closed for in person operations. This setback unfortunately delayed Plaintiff's efforts to oppose this motion. The parties also anticipate the end of the year holidays will further complicate the briefing schedule, necessitating a further extension for Defendants to file their Reply.

Stipulation

It is hereby STIPULATED between James Herndon, through his counsel of record, Marjorie L. Hauf, Esq. and Matthew G. Pfau, Esq., of H & P LAW, and Defendants, City of Henderson, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega through their counsel of record, Nicholas G. Vaskov, Esq. and Nancy D. Savage, Esq. of CITY ATTORNEY'S OFFICE,



to Extend Breifing Deadlines Related to Defendants, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega's Motion for Summary Judgment and Defendant's Reply in Support to Defendants, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega's Motion for Summary Judgment, ECF # 55.

IT IS FURTHER STIPULATED that Plaintiff's Opposition to Defendant, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega's Motion for Summary Judgment must be filed by December 9, 2020.

IT IS FURTHER STIPULATED that Defendants, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega's Reply in Support of Motion for Summary Judgment must be filed by January 18, 2021.

DATED this 1st day of December 2020.

Respectfully submitted by:

H & P LAW

/s/ Marjorie Hauf, Esq.

Marjorie L. Hauf, Esq.

Nevada Bar No.: 8111

Matthew G. Pfau, Esq.

Nevada Bar No.: 11439

*Attorneys for Plaintiff,
James M. Herndon*

Approved as to form and content:

CITY ATTORNEY'S OFFICE

/s/ Nancy Savage, Esq.

Nicholas G. Vaskov, Esq.

Nevada Bar No.: 8298

Nancy D. Savage, Esq.

Nevada Bar No.: 392

*Attorneys for Defendants,
City of Henderson, Sgt. S. Gillis, and
Officers L. Good, A. Nelson, D.
Nerbonne, D. Russo, and E. Vega*

IT IS SO ORDERED.

Dated this 1 day of December, 2020


Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT